

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**RICHARD JORDAN and RICKY CHASE**

*Plaintiffs*

**THOMAS EDWIN LODEN, JR.,  
ROGER ERIC THORSON, and  
ROBERT SIMON, JR.**

*Intervenors*

vs.

**No. 3:15-cv-00295-HTW-LRA**

**PELICIA HALL, Commissioner,  
Mississippi Department of Corrections, in  
her Official Capacity; EARNEST LEE  
Superintendent, Mississippi State Penitentiary,  
in his Official Capacity; THE MISSISSIPPI  
STATE EXECUTIONER, in his Official  
Capacity; an UNKNOWN EXECUTIONERS,  
in their Official Capacities**

*Defendants*

**DEFENDANTS' SUPPLEMENT TO MOTION FOR PROTECTIVE ORDER**

COME NOW Defendants Pelicia Hall,<sup>1</sup> in her official capacity as Commissioner of the Mississippi Department of Corrections (“MDOC”), Earnest Lee, the Superintendent of the Mississippi State Penitentiary, and the Mississippi State Executioner, and respectfully supplement their Motion for Protective Order [Doc. 125] with the following additional exhibits:

Exhibit V	Updated redacted lethal injection drug inventories and logs (MDOC #1265-MDOC #1289;
Exhibit W	Email from ASCA to Pelicia Hall dated 8/9/17 (MDOC #1290-MDOC #1291);
Exhibit X	Letter from Pelicia Hall to Kevin Kempf dated 8/7/17 (MDOC #1294);

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<sup>1</sup> Pursuant to Fed. R. Civ. P. 25(d), Pelicia Hall was automatically substituted as a Defendant when she succeeded Marshall Fisher as the Commissioner of the Mississippi Department of Corrections.

Exhibit Y Redacted Memorandum from Pelicia Hall to File dated 8/15/17 regarding "Discussion Regarding Availability of Pentobarbital";

Exhibit Z Defendants' Supplemental Responses to Plaintiffs' Interrogatories;

Exhibit AA Defendants' Supplemental Responses to Plaintiffs' Requests for Production;

Exhibit BB Defendants' Third Supplemental Privilege Log.

Respectfully submitted, this the 5th day of October, 2017.

**PELICIA HALL, in her official capacity as  
Commissioner of the Mississippi Department of  
Corrections, EARNEST LEE, in his official  
capacity as Superintendent of the Mississippi State  
Penitentiary, THE MISSISSIPPI STATE  
EXECUTIONER, in his official capacity, and  
UNKNOWN EXECUTIONERS, in their official  
capacities**

**BY: JIM HOOD, ATTORNEY GENERAL**

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**CERTIFICATE OF SERVICE**

This is to certify that I, Paul Barnes, Special Assistant Attorney General for the State of Mississippi, have electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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This the 5th day of October, 2017.

*s/Paul Barnes*  
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